Poole, Jill L. (Omaha)

From:

thomas strelka [thomas@strelkalaw.com]

Sent:

Wednesday, July 11, 2012 8:58 AM

To:

Poole, Jill L. (Omaha)

Subject:

Re: Johnson v. Atlas

Jill,

To be honest, though we are working on it, I doubt that we can have the discovery to you by then. If you will not give us an extension, then we will most likely have to file a motion to ask for more time. Given the circumstances of the case, I am fairly certain we would get it.

I will get right back with you regarding depsotion dates.

Tom

Connected by DROID on Verizon Wireless

----Original message----

From: "Poole, Jill L. (Omaha)" poolej@jacksonlewis.com
To: "thomas@strelkalaw.com" <thomas@strelkalaw.com</pre>

Cc: Jon Axelrod <jaxelrod@beinsaxelrod.com> Sent: Mon, Jul 9, 2012 20:42:36 GMT+00:00

Subject: Johnson v. Atlas

Tom:

I have left you several messages regarding this matter. I wanted to let you know that I will need Plaintiffs' responses to Atlas' discovery requests no later than July 25, 2012. I would also like to start scheduling your clients' depositions for the first two weeks of August. Please let me know how you would like to best coordinate these depositions. I look forward to hearing from you.

Thank you,

Jill Poole Attorney at Law Jackson Lewis LLP 10050 Regency Circle, Suite 400 Omaha, NE 68114

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EXHIBIT 1

Case 7:11-cv-00552-SGW-RSB Document 47-1 Filed 07/23/12 Page 2 of 2 Pageid#: 562

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